



April 4, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Fixed Wireless Communications Coalition, Inc., Request for Modified
Coordination Procedures in Bands Shared Between the Fixed Service and the
Fixed Satellite Service; RM-11778

Dear Ms. Dortch:

The Satellite Industry Association ("SIA")¹ respectfully requests the Federal Communications Commission ("FCC" or "Commission") designate the Fixed Wireless Communications Coalition's ("FWCC") above referenced Petition for Rulemaking² ("Petition") as "permit-but-disclose" for purposes of the *ex parte* rules. The Commission has the discretion to modify a proceeding's *ex parte* status in cases where "the public interest so requires,"³ such as in this proceeding.

Changing the designation of this proceeding from exempt to permit-but-disclose will provide greater transparency into the Commission's deliberations regarding the Petition and facilitate discussions relating to the appropriate regulatory framework for

¹ SIA Executive Members include: The Boeing Company; AT&T Services, Inc.; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Artel, LLC; Blue Origin; DataPath, Inc; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; Inmarsat, Inc.; Kymeta Corporation; L-3 Electron Technologies, Inc.; O3b Limited; Panasonic Avionics Corporation; Planet; Semper Fortis Solutions; Spire Global Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

² Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, Dkt. RM-11778 (Oct. 11, 2016).

³ 47 C.F.R. § 1.1200(a).

bands shared by the Fixed Service and the Fixed-Satellite Service. Providing greater transparency with respect to the parties' discussions with the FCC and its staff achieves the aims of the Commission's *ex parte* rules of "ensur[ing] the fairness and integrity of the Commission's decision-making."⁴ This is especially important given the high level of interest in the docket, reflected by the numerous filings expressing a broad range of views with respect to the Petition's merits.⁵ It is in the public interest to ensure that full and open discussions with the FCC staff are disclosed to all parties. In addition, facilitating on-the-record discussions will help staff build a record to support any future action concerning the Petition.

For these reasons, SIA respectfully requests designation of the above-referenced proceeding as "permit-but-disclose."

Sincerely,

/s/

Tom Stroup

President

Satellite Industry Association

⁴ *Id.*

⁵ In the six months since the FWCC filed its Petition, there have been 40 filings in the docket from 28 different parties, including comments and reply comments.